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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 GERALD ARMSTRONG,

CV-N-97-00670 ECR (RAM)

13 Plaintiff,

14 vs.

NOTICE OF TAKING DEPOSITION

15 DAVID MISCAVIGE and CATHY
16 NORMAN, individuals; CHURCH
17 OF SCIENTOLOGY INTERNATIONAL,
18 a California corporation; the
19 RELIGIOUS TECHNOLOGY CENTER,
20 a California corporation; the
21 SEA ORGANIZATION, a California
22 based unincorporated entity;
23 and the CHURCH OF SCIENTOLOGY
24 OF TEXAS, a Texas corporation;

25 Defendants.
26 _____/

27 TO: RELIGIOUS TECHNOLOGY CENTER, (DAVID MISCAVIGE as Chairman of
28 the Board of Religious Technology Center), and N. PATRICK
FLANAGAN, Esq., Attorney for Defendants.

PLEASE TAKE NOTICE that at 9:30 a.m., on the 5th day of
August, 1998, at the law offices of Parker, Milliken, Clark,
O'Hara & Samualian, 333 South Hope Street, 27th Floor, Los
Angeles, California, the Plaintiff in the above entitled action
will take the deposition DAVID MISCAVIGE, of RELIGIOUS TECHNOLOGY
CENTER, upon oral examination pursuant to Fed.R.Civ.P. 30 and L.R.
30-1, before a Notary Public, or before some other officer

1 authorized by the law to administer oaths. Oral examination will
2 continue from day to day until completed. You are invited to
3 attend and cross-examine.

4 The deposition will be limited to the matters which are the
5 subject matter of the August 20, 1998 evidentiary hearing ordered
6 by the Court.

7 PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 30(b)5,
8 Religious Technology Center is requested to produce the following
9 at the commencement of such deposition for inspection and copying.

10 1. All documents then reasonably available which are
11 contemplated to be used in support of the allegations or denials,
12 including rebuttal and impeachment documents, of the pleading
13 filed by Religious Technology Center; together with each and every
14 record or document of any type or kind, including but not limited
15 to paper, magnetic, electronic, files, orders, projects, programs,
16 directives, policies, missions, briefings, debriefings, security
17 checks, targets, reports, evaluations, memoranda, publications,
18 articles, press releases, letters, speeches, interviews,
19 conversations, messages, communications or notes, in the
20 possession of David Miscavige personally, and/or as a Scientology
21 executive on his Scientology post, and/or in possession of each
22 and every director, officer, trustee, employee, volunteer or agent
23 of Religious Technology Center, Church of Scientology
24 International, Church of Spiritual Technology, the Sea
25 Organization and/or any other corporation or other entity within
26 or comprising the global Scientology organization, which in any
27 way, including by code, mention, refer to or concern Gerald
28

1 Armstrong, plaintiff herein.

2 2. Written lists of persons (other than expert witnesses or
3 consultants) then known or reasonably believed to have knowledge
4 of any facts relevant to the allegations of the pleading filed by
5 Religious Technology Center, including persons having knowledge of
6 rebuttal or impeachment evidence.

7 Dated this 20th day of July, 1998.

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9 George W. Abbott
10 Attorney for Plaintiff
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Certificate of Service

I certify that I am an employee of George W. Abbott, and that on July 21, 1998, I deposited for mailing at Minden, Nevada, true copies of the within Notice of Taking Deposition, addressed as follows:

N. Patrick Flanagan, Esq.
Hale, Lane, Peek, Dennison, Howard and Anderson
P. O. Box 3237
Reno, Nevada 89505

Andrew H. Wilson, Esq.
Wilson Campilongo, LLP
115 Sansome Street, Suite 400
San Francisco, California 94104


Mary Abbott